

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In re:  
LTL MANAGEMENT, LLC,<sup>1</sup>  
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**RESERVATION OF RIGHTS  
OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS TO  
DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE PERIOD  
WITHIN WHICH THE DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C.  
§ 1452 AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

The Official Committee of Talc Claimants (the “Committee”), duly appointed by the Office of the United States Trustee, hereby submits the following reservation of rights to the *Debtor’s Motion for Entry of an Order Extending the Period Within which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure* [Dkt. No. 978] (the “Motion”) and respectfully states as follows:<sup>2</sup>

1. The Committee does not object to the extension of the time for the Debtor to remove actions under 28 U.S.C. § 1452 and Rule 9027(a) for 180 days through December 29, 2023. The proposed order included with the Motion makes clear that the Debtor is seeking only to extend its own time to remove actions, and not the time by which non-Debtor parties may seek removal. This limited relief and limited extension appear appropriate at this time.

2. The Committee does not consent to any extension of the Removal Period, express or implied, for any non-Debtor. The Committee reserves all rights, arguments and objections, including the right to contest a further extension of the Removal Period for the benefit of the Debtor, any extension of the Removal Period for non-debtors, and any actual action by the Debtor or any non-Debtor to remove any talc related litigation pursuant to 28 U.S.C. § 1452 and the Federal Rules of Bankruptcy Procedure.

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed thereto in the Motion.

Dated: July 6, 2023

Respectfully submitted,  
**GENOVA BURNS, LLC**

By: /s/ Daniel M. Stolz

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